

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

AUDREY HOGGATT,
Plaintiff,

v.

DIRECT RECOVERY SERVICES, LLC,
ELLE GUSMAN, individually,
and WESTERN SURETY COMPANY,
Defendants.

CASE NO.: 0:22-cv-02629-NEB-LIB

STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiff files this Stipulation of Dismissal (the “Stipulation”), and respectfully shows as follows:

1. Plaintiff commenced this action against Defendants on October 19, 2022. *See* Doc. 1.
2. Defendants have not appeared.
3. Plaintiff no longer desires to pursue this action.
4. Pursuant to FED. R. CIV. P. 41(a), Plaintiff hereby dismisses all claims that were or could have been asserted in this action, and dismisses her claims against Defendants **WITHOUT PREJUDICE**.
5. This is not a class action, no receiver has been appointed and no counterclaims have been asserted.
6. This case is not governed by any federal statute that requires a court order for dismissal of the case.
7. Plaintiff has not voluntarily dismissed any federal or state court suit based on or including the same claims as those presented in this case.

Accordingly, Plaintiff respectfully requests that the Court enter an order dismissing all claims against all parties WITHOUT PREJUDICE as described above.

Respectfully submitted,

/s/ Jeffrey D. Wood

Jeffrey D. Wood, Esq.

ArkBN: 2006164

THE **WOOD** FIRM, PLLC

11610 Pleasant Ridge Rd.

Suite 103, Box 208

Little Rock, AR 72223

TEL: 682-651-7599

FAX: 888-598-9022

EMAIL: jeff@jeffwoodlaw.com

Attorney for Plaintiff

Admitted Pro Hac Vice

and

Curtis Zaun

Minnesota Bar Number 266310

Attorney for Plaintiff

3254 Rice Street

Saint Paul, MN 55126

Telephone: (651) 216-3308

curtis@cpzlaw.com

Attorney for Plaintiff